

Implementation Recommendations

Does the FACDQ want to recommend that the following implementation issues should be identified in the final report?

- What is the lead time labs need to learn the new procedure and perform the determinations for all methods and instruments in their laboratory?
- Which states will need to make corresponding changes in their rules and should this influence the effective date of any new rule?
- How do we ensure method developers are aware of the new changes?
- The reporting and compliance determination recommendations rely heavily on the existence of national QLs which raises several issues:
 - ☐ Full implementation will take years. How do we operate a dual system in the meantime?
 - ☐ Should EPA grandfather some of the existing ML's into the new program, making them de facto national QLs?
 - ☐ How does EPA prioritize the creation of national QLs for existing and new methods?
 - ☐ Is there a more cost effective approach to generating national QLs? Laboratory-generated data?
- What guidance is needed for states?
 - ☐ Confusion between the old and new program, and lots of different QL types (national, state, permit, lab)
 - ☐ Guidance that accompanies the final rule would ensure consistent state implementation and a level playing field
 - ☐ Coordination with EPA Regions and States critical – training and workshops are needed regarding permit writing, reporting, and compliance determinations
- What partnerships should EPA form to ensure smooth implementation?
 - ☐ Laboratory certifying and accrediting programs
 - ☐ ACIL
 - ☐ NACWA
 - ☐ ASIWPCA
 - ☐ Others?
- Will EPA have the right resources?
- [Would organizations represented by members of the Committee commit to not objecting to rules that implement the intent of the Committee recommendations?](#)

Does the FACDQ want to include the information on Implementation Timeline and Education and Outreach, and the Flow Chart as attachments to the final report and due to time constraints identify that they are non-consensus documents, but are just suggestions from various caucuses that could be used for informational purposes only as the EPA addresses implementation?